

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

FILED

JUN 10 2015

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

WILFORD CARTER,

Defendant.

No.

**4:15CR266 HEA/NCC**

INDICTMENT

THE GRAND JURY CHARGES THAT:

A. INTRODUCTION

At all times material to this indictment:

1. Pulaski Bank is a financial institution insured by the Federal Deposit Insurance Corporation.
2. US Bank is a financial institution insured by the Federal Deposit Insurance Corporation.
3. Regions Bank is a financial institution insured by the Federal Deposit Insurance Corporation.
4. Hickory Point Bank & Trust is a financial institution insured by the Federal Deposit Insurance Corporation.

B. THE SCHEME TO DEFRAUD

1. From in or about January 2015 through March 2015, in the Eastern District of Missouri, the defendant, **WILFORD CARTER**, knowingly executed and attempted to execute a scheme and artifice to defraud and to obtain the moneys, funds, credits, assets, securities, or other property owned by, or under the custody or control of financial institutions insured

by the Federal Deposit Insurance Corporation, by means of false and fraudulent pretenses, representations, and promises.

### **C. MANNER AND MEANS OF THE SCHEME TO DEFRAUD**

It was a part of the scheme and artifice to defraud financial institutions and to obtain money under said financial institutions' custody and control by means of false and fraudulent pretenses, representations, and promises in order to deceive, that:

1. Defendant **Wilford Carter** would and did negotiate and execute checks drawn on checking accounts purporting to be legitimately issued by financial institutions, knowing full well that the checking accounts did not exist and that there were no funds on which the counterfeit checks could draw.
2. Defendant **Wilford Carter** would and did receive things of value, including home furnishings and appliances, from the negotiation of such checks drawn on the fraudulent checking accounts in St. Louis, Missouri.
3. Defendant **Wilford Carter** would and did fraudulently negotiate counterfeit checks at businesses in St. Louis, Missouri.

### **D. THE EXECUTION OF THE SCHEME**

#### **COUNT ONE [Bank Fraud]**

1. The United States Grand Jury hereby incorporates by reference and realleges all of the allegations of Sections A, B and C of this Indictment.
2. On or about January 3, 2015, in the Eastern District of Missouri, the defendant, **WILFORD CARTER**, for the purpose of executing the aforementioned scheme and artifice to defraud US Bank, and to obtain moneys, funds, credits, assets, securities, or

other property owned by, or under the custody or control of US Bank, a financial institution insured by the Federal Deposit Insurance Corporation, by means of false and fraudulent pretenses, representations, and promises, did knowingly and fraudulently negotiate counterfeit check #2234, purportedly drawn on a fraudulent US Bank account, in the amount of \$4,484.82, at Mattress Direct in St. Louis, Missouri, knowing full well that the check was not genuine, in violation of Title 18, United States Code, Section 1344.

**COUNT TWO**  
**[Bank Fraud]**

1. The United States Grand Jury hereby incorporates by reference and realleges all of the allegations of Sections A, B and C of this Indictment.
2. On or about February 6, 2015, in the Eastern District of Missouri, the defendant, **WILFORD CARTER**, for the purpose of executing the aforementioned scheme and artifice to defraud Pulaski Bank, and to obtain moneys, funds, credits, assets, securities, or other property owned by, or under the custody or control of Pulaski Bank, a financial institution insured by the Federal Deposit Insurance Corporation, by means of false and fraudulent pretenses, representations, and promises, did knowingly and fraudulently negotiate counterfeit check #3542, purportedly drawn on a fraudulent Pulaski Bank account, in the amount of \$3,212.31, at Slyman Brothers Appliance Center in St. Louis, Missouri, knowing full well that the check was not genuine, in violation of Title 18, United States Code, Section 1344.

**COUNT THREE**  
**[Bank Fraud]**

1. The United States Grand Jury hereby incorporates by reference and realleges all of the allegations of Sections A, B and C of this Indictment.

2. On or about February 11, 2015, in the Eastern District of Missouri, the defendant, **WILFORD CARTER**, for the purpose of executing the aforementioned scheme and artifice to defraud Regions Bank, and to obtain moneys, funds, credits, assets, securities, or other property owned by, or under the custody or control of Regions Bank, a financial institution insured by the Federal Deposit Insurance Corporation, by means of false and fraudulent pretenses, representations, and promises, did knowingly and fraudulently negotiate counterfeit check #3661, purportedly drawn on a fraudulent Regions Bank account, in the amount of \$1,698.23, at Carpets Plus in St. Louis, Missouri, knowing full well that the check was not genuine, in violation of Title 18, United States Code, Section 1344.

**COUNT FOUR**  
**[Bank Fraud]**

1. The United States Grand Jury hereby incorporates by reference and realleges all of the allegations of Sections A, B and C of this Indictment.
2. On or about February 6, 2015, in the Eastern District of Missouri, the defendant, **WILFORD CARTER**, for the purpose of executing the aforementioned scheme and artifice to defraud Pulaski Bank, and to obtain moneys, funds, credits, assets, securities, or other property owned by, or under the custody or control of Pulaski Bank, a financial institution insured by the Federal Deposit Insurance Corporation, by means of false and fraudulent pretenses, representations, and promises, did knowingly and fraudulently negotiate counterfeit check #4256, purportedly drawn on a fraudulent Pulaski Bank account, in the amount of \$1,140.70, at RSI Kitchen and Bath in St. Louis, Missouri,

knowing full well that the check was not genuine, in violation of Title 18, United States Code, Section 1344.

**COUNT FIVE**  
**[Bank Fraud]**

1. The United States Grand Jury hereby incorporates by reference and realleges all of the allegations of Sections A, B and C of this Indictment.
2. On or about March 13, 2015, in the Eastern District of Missouri, the defendant, **WILFORD CARTER**, for the purpose of executing the aforementioned scheme and artifice to defraud Hickory Point Bank & Trust, and to obtain moneys, funds, credits, assets, securities, or other property owned by, or under the custody or control of Hickory Point Bank & Trust, a financial institution insured by the Federal Deposit Insurance Corporation, by means of false and fraudulent pretenses, representations, and promises, did knowingly and fraudulently negotiate counterfeit check #3909, purportedly drawn on a fraudulent Hickory Point Bank & Trust account, in the amount of \$2,446.03, at Just Around the Corner in St. Louis, Missouri, knowing full well that the check was not genuine, in violation of Title 18, United States Code, Section 1344.

**COUNT SIX**  
**[Bank Fraud]**

1. The United States Grand Jury hereby incorporates by reference and realleges all of the allegations of Sections A, B and C of this Indictment.
2. On or about February 23, 2015, in the Eastern District of Missouri, the defendant, **WILFORD CARTER**, for the purpose of executing the aforementioned scheme and artifice to defraud UMB Bank, and to obtain moneys, funds, credits, assets, securities, or other property owned by, or under the custody or control of UMB Bank, a financial

institution insured by the Federal Deposit Insurance Corporation, by means of false and fraudulent pretenses, representations, and promises, did knowingly and fraudulently negotiate counterfeit check #2194, purportedly drawn on a fraudulent UMB Bank account, in the amount of \$1,913.70, at Ashley Furniture Home Store in St. Louis, Missouri, knowing full well that the check was not genuine, in violation of Title 18, United States Code, Section 1344.

**COUNT SEVEN**  
**[Bank Fraud]**

1. The United States Grand Jury hereby incorporates by reference and realleges all of the allegations of Sections A, B and C of this Indictment.
2. On or about February 23, 2015, in the Eastern District of Missouri, the defendant, **WILFORD CARTER**, for the purpose of executing the aforementioned scheme and artifice to defraud UMB Bank, and to obtain moneys, funds, credits, assets, securities, or other property owned by, or under the custody or control of UMB Bank, a financial institution insured by the Federal Deposit Insurance Corporation, by means of false and fraudulent pretenses, representations, and promises, did knowingly and fraudulently negotiate counterfeit check #2199, purportedly drawn on a fraudulent UMB Bank account, in the amount of \$312.33, at Ashley Furniture Home Store in St. Louis, Missouri, knowing full well that the check was not genuine, in violation of Title 18, United States Code, Section 1344.

full well that the check was not genuine, in violation of Title 18, United States Code, Section 1344.

A TRUE BILL

---

FOREPERSON

RICHARD G. CALLAHAN  
United States Attorney

---

GWENDOLYN E. CARROLL  
Assistant United States Attorney